

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DIANE RECZEK,	)	
	)	
Plaintiff,	)	C.A. No. 07-00013-GMS
	)	
v.	)	
	)	
TILTON TERRACE OF DELAWARE,	)	
L.L.C. d/b/a TILTON TERRACE; and,	)	
JHA WILMINGTON, INC.,	)	
	)	
Defendants.	)	

**STIPULATION FOR EXTENSION OF TIME**

WHEREAS, Defendant JHA Wilmington, Inc. was unable to retain counsel to represent it in connection with this action until January 23, 2007; and

WHEREAS, counsel for JHA Wilmington, Inc. is unable to fully investigate the facts of the case to prepare an adequate response to the Complaint prior to the existing deadline of January 30, 2007; and

WHEREAS, counsel for both parties believe that a two-week extension will not substantially impact the parties' rights or delay the processing of the litigation;

NOW, THEREFORE, it is hereby stipulated, subject to the approval of the Court, that the time in which Defendant JHA Wilmington, Inc. may respond to the Complaint is hereby extended from January 30, 2007 to **February 13, 2007**.

A proposed form of Order is attached hereto.

LAW OFFICES OF G. KEVIN FASIC, LLC

By: /s/ G. Kevin Fasic  
G. Kevin Fasic (No. 3496)  
1225 King Street, Suite 200  
Wilmington, DE 19801  
302-654-4501 (phone)  
302-654-4406 (facsimile)  
[k.fasic@lawgkf.com](mailto:k.fasic@lawgkf.com)

*Counsel for Plaintiff*

Dated: January 26, 2007

CROSS & SIMON, LLC

By: Erica N. Finnegan  
Erica N. Finnegan (No. 3986)  
913 North Market Street, 11<sup>th</sup> Floor  
Wilmington, Delaware 19801  
302-777-4200 (phone)  
302-777-4224 (facsimile)  
[efinnegan@crosslaw.com](mailto:efinnegan@crosslaw.com)

*Counsel for JHA Wilmington, Inc.*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DIANE RECZEK,	)	
	)	
Plaintiff,	)	C.A. No. 07-00013-GMS
	)	
v.	)	
	)	
TILTON TERRACE OF DELAWARE,	)	<b>Re: Docket No.</b>
L.L.C. d/b/a TILTON TERRACE; and,	)	
JHA WILMINGTON, INC.,	)	
	)	
Defendants.	)	

**ORDER GRANTING EXTENSION OF TIME**

The Court having considered the Stipulation for Extension of Time (the “Stipulation”), entered into by Plaintiff and Defendant JHA Wilmington, Inc. and the Court having determined that good and adequate cause exists for approval of the Stipulation;

**IT IS HEREBY ORDERED** that the Stipulation is approved; and

**IT IS FURTHER ORDERED** that the time for Defendant JHA Wilmington, Inc. to respond to the Complaint is extended through and including February 13, 2007.

Dated: \_\_\_\_\_, 2007

\_\_\_\_\_  
Judge Gregory M. Sleet